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October 8, 2024

The Honorable Magistrate Judge Stewart D. Aaron
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

USDC SDNY
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APPLICATION GRANTED


Hon. Stewart D. Aaron, U.S.M.J.
Dated: October 9, 2024

Re: *Burts v. Commissioner of Social Security*, Case No. 1:24-cv-03596-DEH-SDA (S.D.N.Y.)

Dear Judge Aaron:

I am *pro bono* counsel for Plaintiff Alfred Louis Burts in the above-captioned matter. Plaintiff initially appeared *pro se* in this matter to file a Complaint. Dkt. No. 1. On September 15, 2024, Defendant Commissioner of Social Security (“Commissioner”) filed a letter motion requesting an extension of the briefing schedule. Dkt. No. 13. The Court granted that request on September 16, 2024, ordering that “[t]he Commissioner’s brief is due no later than October 15, 2024,” “Plaintiff shall file any opposition no later than December 15, 2024,” and “[t]he Commissioner’s reply, if any, is due no later than December 31, 2024.” Dkt. No. 14 at 2.

Last week, my firm was retained by Mr. Burts as *pro bono* counsel in this case. I filed my notice of appearance on October 7, 2024. Dkt. No. 15. Upon being retained, I promptly conferred with counsel for Defendant regarding an extension to the proposed briefing schedule. As a result of this conference, the parties agreed to the following proposed schedule:

- Plaintiff’s opening brief: November 15, 2024.
- Commissioner’s opposition: January 14, 2025.
- Plaintiff’s reply: February 13, 2025.

Accordingly, I write to respectfully request an extension of the briefing schedule to reflect the deadlines agreed to by the parties. Such an extension is warranted to allow newly-retained *pro bono* counsel for Mr. Burts time to review the record and prepare and file an opening brief on his behalf. This is Mr. Burts’s first request for an extension of time. As previously discussed, the Commissioner previously filed (and received) one requested extension to the briefing schedule. I have conferred with counsel for the Commissioner, who consents to this request and has agreed to the proposed revised briefing schedule set forth above.

Thank you in advance for your consideration on this matter.

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Respectfully submitted,

/s/ Ryan Joseph Sheehan
Ryan Joseph Sheehan

cc: All Counsel (by ECF)